



November 10, 2017

The Honorable Anita B. Brody
James A. Byrne U.S. Courthouse
601 Market Street
Room 7613, Courtroom 7-B
Philadelphia, PA 19106-1717

RE: *In Re: National Football League Players' Concussion Injury Litigation, MDL 2323*

Dear Judge Brody:

We are members of the Court-appointed Plaintiffs Steering Committee and/or counsel to retired NFL players in the matter *In re National Football Players Concussion Injury Litigation*, 12-md-2323-AB. Together, we represent well over one thousand retired NFL players individually in the MDL. We write regarding the chambers conference scheduled for November 13, 2017, related to issues regarding the implementation of the settlement agreement (Dkt. #8909), but which limits attendance to Chris Seeger, the NFL, and the Special Masters. We respectfully ask that this conference be made open to all Class members and their Counsel, namely, those who are experiencing and reporting the many issues with the implementation of the settlement agreement.

Our clients are but a few of the many affected by the problems that have befallen the administration of this settlement. These problems include, most seriously, the imposition of new settlement terms to exclude otherwise valid claims, the denial of facially valid claims, the appeal of plainly meritorious claims, and lengthy delays prejudicing this Class of older, ill, retired NFL players. We, and many others, have reported these issues to Chris Seeger and the Claims Administrator without a satisfactory response. Also highly concerning is the fact that the Claims Administrator has informed us in no uncertain terms that he is interpreting the Settlement Agreement according to ongoing guidance from the NFL and Chris Seeger and not according to its plain language. This is contrary to his duty under the Settlement, under this Court's orders, and to his public representations.

To ensure a fair and thorough discussion of these issues, we respectfully request that the November 13, 2017 conference, which involves thousands of players, be open to them, including *pro se* players who lack counsel to protect their own interests, and the public so that those who are actually experiencing and expressing their concerns may have a chance to be heard.

Respectfully submitted,

s/ Charles S. Zimmerman
Zimmerman Reed LLP

s/ Michael L. McGlamry
Pope McGlamry

s/ Thomas V. Girardi
Girardi Keese

s/ Jason E. Luckasevic
Goldberg Persky White P.C.

s/ Darriel McCorvey
McCorvey Law, LLC